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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 MICHELLE LOU, MARSHA BEER,
SIMON NIM AND JESUAN RUIZ
15 RODRIGUEZ, Individually and On Behalf of
All Others Similarly Situated,
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Plaintiffs,
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v.
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19 MA LABORATORIES, INC., ABRAHAM
MA, also known as CHIH KENG MA, and
CHRISTINE RAO, also known as RUITING
20 C. RAO, and CHRISTY YEE,
Defendants.
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No. 3:12-cv-05409-WHA (NC)

**STIPULATION AND ~~PROPOSED~~
ORDER DISMISSING PLAINTIFFS
MARSHA BEER, SIMON NIM, AND JESUAN
RUIZ RODRIGUEZ**

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1 IT IS HEREBY STIPULATED by and between Plaintiffs Marsha Beer, Simon Nim, and
2 Jesuan Ruiz Rodriguez and Defendants Ma Laboratories, Inc., Abraham Ma, and Christine Rao
3 that the claims in this action of Plaintiffs Beer, Nim and Rodriguez are hereby dismissed with
4 prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1), and with each side to bear its own
5 fees and costs. This Stipulation does not affect the legal claims of former putative class members
6 who had filed notices of consents to join the proposed FLSA collective action as opt-in plaintiffs.

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9 Dated: March 25, 2014

SANFORD HEISLER, LLP

10 By:

/s/ David Sanford
DAVID SANFORD
(Admitted *pro hac vice*)

Attorneys for Plaintiffs

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13 Dated: March 21, 2014

BERLINER COHEN

14 By:

/s/ Kara L. Arguello
CHRISTINE H. LONG
SUSAN E. BISHOP
KARA ARGUELLO

Attorneys for Defendants

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19 **IT IS SO ORDERED.**

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22 DATED: April 2, 2014.

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24 UNITED STATES DISTRICT JUDGE
WILLIAM H. ALSUP